

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

In re VALEANT PHARMACEUTICALS
INTERNATIONAL, INC. SECURITIES
LITIGATION

) Master No. 3:15-cv-07658-MAS-LHG

)

) CLASS ACTION

)

This Document Relates To:

) Judge Michael A. Shipp

) Magistrate Judge Lois H. Goodman

)

ALL ACTIONS.

) Special Master Dennis M. Cavanaugh,

) U.S.D.J. (ret.)

STIPULATION AND ORDER SETTING BRIEFING SCHEDULE

This Stipulation is entered into between Lead Plaintiff TIAA and City of Tucson, together with and on behalf of the Tucson Supplemental Retirement System (“Plaintiff”) and Pricewaterhouse Coopers LLP (“PWC”).

WHEREAS Special Master Dennis M. Cavanaugh issued a Report & Recommendation on November 30, 2022 [ECF 1077] denying PWC’s Motion to Dismiss Count III of the Second Amended Complaint (the “November 30 R&R”);

WHEREAS, on December 7, 2022, Plaintiff filed Motion to Adopt the November 30 R&R calendared for the January 3, 2023 motion date before the Hon. Michael A. Shipp;

WHEREAS PWC intends to oppose Plaintiff's Motion to Adopt and also file an Objection to the November 30 R&R; and

WHEREAS Plaintiff and PWC wish to avoid any dispute over the due date for PWC's opposition and also wish to accommodate holiday schedules;

NOW, THEREFORE, it is hereby Stipulated and Agreed by Plaintiff and PWC that:

1. PWC shall have through and including December 21, 2022 to serve (by ECF or email) and file any opposition to Plaintiff's Motion to Adopt and any Objection to the November 30 R&R;

2. Plaintiff shall have through and including January 11, 2023 to serve (by ECF or email) and file any reply to its Motion to Adopt and any opposition to PWC's Objection; and

3. PWC shall have through and including January 20, 2023 to serve (by ECF or email) and file any reply in further support of its Objection.

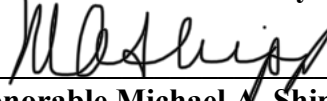
Dated: December 20, 2022

STIPULATED AND AGREED BY:

<p>CHIESA SHAHINIAN & GIANTOMASI PC A. ROSS PEARLSON</p> <p><u>/s/ A. Ross Pearlson</u> A. ROSS PEARLSON One Boland Drive West Orange, NJ 07052 Telephone: (973) 530-2100 Fax: (973) 530-2300 rpearlson@csglaw.com</p> <p>Local Counsel</p>	<p>SEEGER WEISS LLP CHRISTOPHER A. SEEGER JENNIFER SCULLION</p> <p><u>/s/ Jennifer R. Scullion</u> JENNIFER R. SCULLION 55 Challenger Road, 6th Floor Ridgefield Park, NJ 07660 Telephone: 973-639-9100 cseeger@seegerweiss.com jscullion@seegerweiss.com</p> <p>Local Counsel</p>
<p>BARTLIT BECK LLP PHILIP S. BECK MARK L. LEVINE CHRISTOPHER D. LANDGRAFF 54 W. Hubbard Street Chicago, Illinois 60654 Telephone: 312-494-4411</p>	<p>ROBBINS GELLER RUDMAN & DOWD LLP JAMES E. BARZ FRANK RICHTER 200 South Wacker Drive, 31st Floor Chicago, IL 60606 Telephone: 312-674-4674 Fax: 312-674-4676</p>

<p>BARTLIT BECK LLP JASON C. MURRAY 18801 Wewatta Street, 12th Floor Denver, CO 80202 Telephone: 303-592-3100</p> <p>Lead Counsel for Pricewaterhouse Coopers LLP</p>	<p>ROBBINS GELLER RUDMAN & DOWD LLP JAMES E. BARZ FRANK RICHTER 200 South Wacker Drive, 31st Floor Chicago, IL 60606 Telephone: 312-674-4674 Fax: 312-674-4676</p> <p>Lead Counsel for Plaintiff</p>
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So Ordered this 22nd day of December, 2022.



Honorable Michael A. Shipp, U.S.D.J.